



R05-18-A-026

DAVE SNOW
Mayor

CITY OF RICHMOND

50 NORTH FIFTH STREET - RICHMOND, IN 47374
PHONE (765) 983-7208 - FAX (765) 962-7212
Email - dsnow@richmondindiana.gov

November 16, 2017

U.S. Environmental Protection Agency, Region 5
Attn: Ms. Jan Pels
77 West Jackson Boulevard, Mail Code SE-7J
Chicago, IL 60604-3507

Dear Ms. Pels:

On behalf of the City of Richmond, Indiana, I am pleased to submit this application to the U.S. EPA Brownfield Assessment Grant for hazardous substances (\$150,000) and petroleum (\$150,000) for a total of \$300,000. Our City (population 36,291) is situated in Wayne County, on the Indiana side of the Indiana/Ohio border. Transected by two major roadways, Interstate 70 and US-40 (the first highway built by the federal government), our city has a rich history of manufacturing. By the Industrial Age we had established ourselves as a growing, thriving industrial hub, integral to the production of a broad range of products including parts for the automotive and farming industry, school buses, and piano manufacturing.

Our city has suffered decades of impact from brownfields and blight. Recently, we have acknowledged this and have begun to systematically address these concerns. In response, Richmond's brownfield programs have become a key component in redevelopment. We have teamed with the Indiana Brownfields Program for several projects as well as with the EPA (through one assessment and two cleanup grants in the 2000's), from which many properties have been redeveloped. We have also leveraged local and private funding to address brownfields and redevelop properties in our community. Our priorities for the grant will be to update and refine our brownfields inventory/site prioritization and to continue assessments and cleanup plans for high priority sites.

Our target area (the Depot District) is experiencing significant challenges, including higher than average unemployment, a decline in available jobs, low wages, and high poverty which has strained the economic welfare of target area residents. Economic decline has left residents without competitive wages and has also left potentially contaminated, vacant properties behind. These properties attract criminal activity and threaten the health of residents living near them.

Each priority site is in the Depot District where significant investment in redevelopment has already been made, and even more investment is planned/committed. We have either leveraged or committed over \$2.4M on projects in the target area. This investment, added to EPA grant funding, will ensure redevelopment progress towards potentially hundreds of new jobs and a vibrant renewed gateway to our City. The U.S.EPA Brownfield Assessment Grant is an integral


piece of the City's strategy towards addressing these blighted and underutilized properties. By assessing, cleaning up, and reusing these sites, Richmond can return to being a wonderful place to live, work, and play!

As requested, please find the following information regarding this grant application:

- a. Application Identification: City of Richmond, 50 N 5th St., Richmond, IN 47374
- b. Funding Requested:
 - i) Grant Type: Assessment
 - ii) Assessment Grant Type: Community-wide
 - iii) Federal Funds Requested: \$300,000
 - iv) Contamination: Hazardous Substances (\$150,000) & Petroleum (\$150,000)
- c. Location: City of Richmond, Wayne County, IN
- d. N/A
- e. Contacts:
 - i) Project Director: Jack Cruse, Director, Dept. of Infrastructure & Development, City of Richmond, Phone (765) 983-7584, Fax: (765) 962-7024, email: jcruse@richmondindiana.gov, Mailing address: 50 N. 5th Street, Richmond, IN 47374
 - ii) Chief Executive/Highest Ranking Elected Official: Mayor David Snow, City of Richmond, IN, Phone (765) 983-7207, Fax: (765) 962-7024, email: dsnow@richmondindiana.gov, Mailing address: 50 N. 5th Street, Richmond, IN 47374
- f. Population:
 - i.) City of Richmond – 36,291 (2015 American Community Survey 5-Year Estimates)
 - ii.) N/A
 - iii.) Wayne County, Indiana the county within which the City of Richmond is located, does not qualify as experiencing “persistent poverty” as defined in the FY18 Guidelines for Brownfields Assessment Grants.
- g. The Regional Priorities Form/Other Factors Checklist is included as an attachment to this cover letter.
- h. The letter from the Indiana Department of Environmental Management acknowledging our plans to conduct assessment activities and to apply for federal grant funding is attached to this cover letter.

The City of Richmond hopes to be a model and leader in Indiana brownfields redevelopment. Thanks to our partnership with the EPA, the Indiana Brownfields Program, and our citizens, we are making progress toward addressing and resolving our long-standing brownfield issues. This grant is essential to successfully redeveloping properties in our communities. We look forward to accelerating our extensive program of community engagement with the assistance of the U.S. EPA.

Sincerely,



David Snow, Mayor
City of Richmond, Indiana

COVER LETTER ATTACHMENTS

- I. Regional Priorities Form/Other Factors Checklist
- II. State Acknowledgement Letter

COVER LETTER ATTACHMENT I

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Richmond, Indiana

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Coordinated Public Funding for Brownfields

Page Number(s): Pages 10-11

Assessment Other Factors Checklist

Please identify (with an **x**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	Pages 8-9
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	Pages 10-11 & Att. I
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

COVER LETTER ATTACHMENT II



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 16, 2017

The Honorable Dave Snow, Mayor
City of Richmond
50 North 5th
Richmond, Indiana 47374

Re: IDEM Acknowledgement Letter
U.S. EPA Brownfields Grant Proposal
Community-wide Assessment
Hazardous Substances and Petroleum
City of Richmond
Wayne County, Indiana

Dear Mayor Snow:

This letter is provided in support of the City of Richmond's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is requesting \$300,000 (\$150,000 for hazardous substances and \$150,000 for petroleum).

It is IDEM's understanding that this funding will be utilized to expand the existing brownfield inventory with an initial prioritization of identified brownfield sites on the basis of: 1) redevelopment potential, 2) environmental or human health impact and community environmental justice issues, and 3) community input. IDEM is aware that the City has also identified the Depot District as the target area in the community as the focal point for at least five targeted sites for environmental assessments to be conducted based on need and mixed redevelopment goals (e.g., commercial, residential, recreational).

IDEM believes that the City has demonstrated its commitment to redeveloping brownfields by having taken advantage of financial and/or technical assistance offered by U.S. EPA (City of Richmond as a U.S. EPA grantee) and the Indiana Brownfields Program (several enrolled sites). This Assessment grant funding will help the City continue its efforts to address brownfields to facilitate future economic growth. Should an opportunity arise for the City to need petroleum eligibility determinations or cleanup/closure assistance at any of the sites investigated with this grant funding, IDEM understands that the City plans to enroll sites for closure via the Indiana Brownfields Program or the IDEM Voluntary Remediation Program.

IDEM Acknowledgement Letter
U.S. EPA Brownfields Grant Proposal
November 16, 2017
Page 2 of 2

Based on the information submitted, IDEM considers the City of Richmond an excellent candidate to receive U.S. EPA grant funding again to continue its local brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program directly at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,



Bruce A. Oertel, Chief
Remediation Services Branch
Office of Land Quality

BAO/mmo

cc: (via electronic transmission)
Joel Markland, BCA Environmental Consultants, LLC

IV.C.3. Narrative Proposal/Ranking Criteria

IV.C.3.1. Community Need, a. Targeted Area & Brownfields, i. Community & Target Area

Descriptions: The City of Richmond (the City) is situated in east-central Indiana, approximately 70 miles east of Indianapolis on the Indiana side of the Indiana/Ohio border. We are often referred to as the Eastern Gateway to Indiana. Richmond is the most populous city in Wayne County and serves as the county seat. First settled in 1806, our community grew quickly in population and size. A thriving commercial center developed, spurred by the growth of a diverse transportation infrastructure including The National Road (US-40), the first highway built by the federal government, stretching from the Potomac River in Cumberland, MD through Richmond to Vandalia, IL, just 63 miles northeast of St. Louis. Our city also became a hub for many railroads. With this transportation network in place, Richmond quickly developed a rich history of manufacturing, and by the industrial age, had established ourselves as a growing, thriving industrial hub, producing a broad range of products for the automotive and farming industry, school buses, and piano manufacturing. From the mid-19th to the mid/late 20th century, Richmond grew and thrived around these industries.

However, as with much of the Midwest's "rust belt", our manufacturing base began to decline in the 1960s and 1970s. Of the industries that survived, many chose to leave the city center for "greenfields" on the periphery, leaving once thriving industrial and commercial corridors in a state of decay. Historic neighborhoods that had developed in and around these corridors have been pulled down with this decline, leaving behind communities burdened with a large number of brownfields.

Today, much of our city's residents still feel the impacts of these losses. Although many residents have returned to the workforce, they are now working for less pay as evidenced by the 2011-2015 American Community Survey 5-yr. estimates (2015 ACS) data showing a low Median Household Income (MHI) (\$30,357) compared to Indiana (\$49,255) and a significantly higher percentage of persons below the poverty level (27.3%) compared to Indiana's figures (15.4%). Those suffering the most are concentrated in a few specific neighborhoods and corridors in our community. These worst hit areas are also where redevelopment investment has the greatest opportunity for success. Richmond has identified the Depot District as the target area where EPA Brownfield Assessment Grant funding will have the greatest impact. A focused effort has been made to invest in the Depot District, creating detailed redevelopment plans to maximize investments made and leverage additional funding in this withering area of our community. If properties outside the target area become high priority during the cooperative agreement period, we may choose to invest grant funding on them as well; however, the redevelopment focus for this grant will remain the Depot District.

Depot District – Stretching 2.5 miles long, the nearly 300 acre Depot District extends east/west through Richmond north of downtown. Bordered roughly by North F St. to the north, North D St. to the south, Elks Country Club Rd. to the east, and Whitewater River to the west (Census Tracts 2, 5, and a small portion of 11), the corridor separates primarily residential properties to the north from downtown to the south. The District Depot is transected by the Norfolk Southern rail line, which is still active, and the catalyst for the historical development in the area. However, as popularization of alternative shipping and transportation methods grew, rail-centered development atrophied, requiring new investment and development to revitalize this area. The Depot District has a blend of commercial, industrial, medical/health care, and residential properties, serving as one of the primary residential and employment centers for our community. On the west end of the Depot District, the Whitewater Valley Gorge Park was recently created on the location of the former Starr Piano Company. Soil and groundwater remediation activities were completed prior to redeveloping this site into the park which showcases the unique natural beauty and geologic features of the Whitewater River Gorge, including 30 to 40-foot high limestone and shale cliffs rising from the riverbed.

Despite these planned developments and unique amenities, the Depot District still suffers from blight and decay due to decades of industrial attrition. Many of the businesses remaining in the area have reduced their operations resulting in underutilization of the properties they occupy. Businesses such as the Engineered Plastic Components, Cinram, Inc. and Sodexo have all closed in the last decade, while others such as Masterbrand Cabinets, Palladium-Item, General Aluminum, and Rural Metro have had significant layoffs. These job losses (nearly 1,200) have left many Depot District residents without jobs and living among empty, dilapidated properties. Other sites such as the Glazer Roundhouse and the Former J St Auto Parts Salvage Yard total over 125 acres (40% of the target area) of vacant or

underutilized land in the Depot District. The Richmond Comprehensive Plan, Bicycle and Pedestrian Master Plan, and City Unified Development Ordinance (Richmond Redevelopment Plans) identify the need to promote mixed-use development incorporating land uses that combine residential/commercial and office/retail development. These plans also specify the need for more entertainment, recreational, and retail options, as well as the development of bicycle and pedestrian amenities to provide safe, healthy, and convenient travel between neighborhoods, schools, jobs, and recreational opportunities. The target properties in the Depot District and other brownfields in our city, with the support of EPA assessment grant funding, are excellent opportunities to execute these plans, acting as a spring board for growth and prosperity in areas of our community where investment is desperately needed.

IV.C.3.1.a.ii. Demographic Information & Indicators of Need: For decades, Richmond has suffered extraordinarily low wages and a very high poverty rate. The wage gap experienced by our residents is a direct impact from the losses of high wage paying positions in the automobile, bus, farm implement, and piano manufacturing industries, including the 1,200 job losses detailed above. Although Wayne Co. does not meet the definition of persistent poverty over the past 30 years, Small Area Income & Poverty Estimates show the 2015 poverty rate was 18%. The loss of once thriving industries has left a void in the City, especially in the Depot District. According to the 2015 ACS, 27.3% of Richmond residents live in poverty compared to 15.3% and 15.5% for Indiana and the U.S. respectively. Low income is even more prevalent in the Depot district, where a staggering 39.6% of residents live below the poverty line, including over 55% of children. At 8.4%, unemployment in the Depot District is nearly twice that of the City as a whole, and more than 2 times that of Indiana, and the nation. Finally, the 2 census tracts that primarily make up the target area have an MHI ranging from \$25,827 to \$21,167, which are lower than the already low MHI for Richmond (\$30,357), and far less than half the state and national figures. It is very clear that the residents in the Depot District suffer dramatic wage disparities. Another disparity is the high number of vacant homes in the Depot District. At over 28%, the Depot District has more than 2 times the percentage of vacant homes compared to Indiana and the U.S., indicating the poor economic condition the Depot District is in compared to Indiana as a whole.

Table 1 – Demographics

	Depot District	City of Richmond	Indiana	National
Population:	8013 ¹	36,291 ¹	6,568,645 ¹	316,515,021 ¹
Unemployment:	8.4% ¹	4.4% ²	3.6% ²	4.1% ²
Poverty Rate:	39.6% ¹	27.3% ¹	15.4% ¹	15.5% ¹
Percent Minority:	19.1% ¹	17.5% ¹	19.5% ¹	37.7% ¹
Median Household Income (MHI):	\$23,805 ¹	\$30,357 ¹	\$49,255 ¹	\$53,889 ¹
Children Below Poverty Level:	55.1% ¹	42.8% ¹	21.9% ¹	21.7% ¹
Elderly Below Poverty Level	22.5% ¹	12.7% ¹	7.3% ¹	9.4% ¹
Renter-occupied Housing Units:	28.4% ¹	16.5% ¹	11.3% ¹	12.3% ¹

¹2011-2015 ACS 5-Year Estimates, U.S. Census, ²Indiana Department of Workforce Development (IDWD), most recent data available September, 2017

IV.C.3.1.a.iii. Description of the Brownfields: Richmond's industrial history has resulted in an abundance of brownfields which the City has begun to systematically address, and the Depot District has a significantly higher concentration of brownfields compared to the rest of our city. The highest priority sites listed in Table 2 offer the greatest opportunity to trigger successful redevelopment and resurgence in this hard hit corridor of our community. Although we have worked to address brownfields in our community, dozens are still present in the Depot District, including junk/scrap yards, former railroad depots and a roundhouse, and a commercial laundry facility. These sites force already financially stressed residents to suffer through the blight and dilapidated conditions that remain. The historical uses of our highest priority sites, likely environmental issues, and potential health effects on those exposed to these uncontrolled sites are summarized in Table 2 below.

Table 2 – Priority Brownfield Sites and Impacts

Priority Site, Size & Proximity to Target Area Residents	Historic Use/Suspected Contaminants	Redevelopment Goals
3rd St. Depot & Railroad Siding – 2.1 acres, adjoins park & Whitewater River, 1 block from low income neighborhood	Railroad siding and depot /PCBs, metals, petroleum, pesticides, herbicides, VOCs, PAHs, asbestos	City Park
Pennsylvania Railroad Depot - 0.9 acres, adjoins low income neighborhood	Railroad depot / PCBs, metals, petroleum, pesticides, herbicides, VOCs, PAHs, asbestos	Office/Depot District Economic Development & Redevelopment incubator
Former Mechanic's Laundry - 0.5 acres, adjoins low income neighborhood	Former commercial laundry / metals, petroleum, pesticides, herbicides, VOCs, PAHs, asbestos	Parking lot to support Economic Development & Redevelopment Center
Glazer Scrap Yard - 3.2 acres, adjoins Whitewater River & low income neighborhood, 500' from medical bldg.	Former scrap yard / metals, petroleum, VOCs, PAHs, PCBs	Mixed residential/commercial
Former J St Auto Salvage Yard - 25.0 acres, adjoins low income neighborhood	Auto salvage yard / metals, petroleum, VOCs, PAHs, glycols	Light industrial/commercial
Glazer Roundhouse - 101.1 acres, adjoins low income neighborhood	Railroad switchyard & roundhouse / PCBs, metals, petroleum, pesticides, herbicides, VOCs, PAHs	City park & community garden

**According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 2 pose a real threat to human health. Health threats include: skin damage, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer (www.atsdr.cdc.gov).*

Brownfields affect the health and safety of residents, expressly those who live and work in the Depot District. Direct contact and ingestion of contaminants and/or exposure to airborne particulates and VOC vapors pose a human health threat. Exposure to contaminants may result in carcinogenic or toxicological impacts and may cause birth defects. Vacant and deteriorating buildings often contain asbestos and lead-based paint presenting a danger to nearby residents. Many properties are unsecured and trespassers, including children, risk exposure to toxic chemicals, asbestos and unsafe structures. Many of these properties are adjacent to or interspersed with homes, parks, businesses, and churches. The threat of leaking underground storage tanks causing soil and groundwater contamination is a legitimate concern. The brownfields found in the Depot District are a clear health and safety risk, and they discourage investment and redevelopment. Developers are hesitant to invest in property in the area because the risk of a poor return on investment is simply too high. The EPA grant will reduce this risk by providing the initial investment stake for brownfield properties to not only inform reluctant investors of the properties' environmental conditions, but to help them see and understand the investment potential of these properties, thereby catalyzing reinvestment in the target area.

IV.C.3.1.b. Welfare, Environmental, & Public Health Impacts, i. Welfare Impacts: Richmond's Target Area contains some of the poorest neighborhoods in our city. Residents in the Depot District have lived through decades of blight, decay, crime, and vandalism among other welfare challenges caused by nearby brownfields such as the two train depots, the roundhouse, the salvage/scrap yards, and Mechanic's Laundry. Abandoned and underutilized properties pose health and safety threats, reduce property values, reduce the likelihood of new business investment, and discourage investment in residential properties. The 3rd Street Depot, located next to a park and a low income neighborhood, and the J Street Auto Parts property are both examples of sites where area residents are threatened by health and safety concerns that these brownfields pose, and the resulting negative economic impacts from their decay. Decades of these conditions have resulted in a mindset that is not conducive to progress and prosperity. Instead, disinvestment and criminal activity have become the standard in the Depot District, having an overall detrimental impact on our neighborhoods and the health and well-being of our residents, especially our most vulnerable citizens. Brownfields appear to be just one of many negative and cumulative factors affecting the health and welfare of these sensitive groups. For example, the City's criminal activity is on the rise, and abandoned or vacant brownfield sites in the Depot District are the location of many violent and property crimes. According to the FBI's uniform crime reports for 2016, the overall crime rate in Richmond is 49% higher than that of the nation. Violent crime in Richmond is 41% higher than in Indiana and 48% higher than the nation. Homeless and vagrants are

often encamped in our brownfields, where drug and alcohol paraphernalia is found regularly. According to the Governor's Commission for a Drug Free Indiana - Wayne County Comprehensive Plan, the county saw a 28% increase in heroin/opioid charges than the previous year. This increase was not limited to the adult population, as high school students saw a significant increase as well. Wayne County Coroner Ron Stevens recently stated that there were 42 opioid deaths in 2016. However, as of mid-September 2017, Wayne County had 49 opioid deaths, making the projected death toll for 2017 to be over 70, nearly a 100% increase. Dozens of incidents requiring public safety professionals occurred in October 2017 alone, including police calls for narcotics use, theft, assault, public intoxication, and burglary. Richmond Police data indicates that the Depot District has over 3 times the number of police calls per acre than the rest of the City. Redevelopment in the Depot District will reduce blight, reverse decay, and reinstate a pride of ownership, and will incentivize investment from those working and living in the area. This, in turn, will help reduce crime and vandalism, and plant the seeds of prosperity where the need is the greatest.

IV.C.3.1.b.ii. Cumulative Environmental Issues: The high number of brownfield sites is only a portion of the threat to Richmond residents and the target area from environmental concerns. Many active, productive industries add to the environmental threat to surrounding residents and ecology. In fact, there are 591 properties in the City that have environmental records on the Indiana Department of Environmental Management's Database. The EPA's EnviroFacts website lists 11 sites that handle hazardous waste where releases requiring cleanup have occurred. The cumulative environmental impacts of these properties/operations within and surrounding the target area, and their proximity to sensitive populations (low income residents, impoverished children/elderly), create potential environmental justice issues. The vast majority (82.5%) of the housing stock in the City was built prior to 1979 according to the 2015 ACS and older homes a greater risk for high lead levels from paint.

Richmond is bisected by US-40 and adjoins Interstate 70, both heavily traveled by trucks transporting products from the east/west across the nation. According to the 2010 EPA Near-Roadway Research, "People who live, work, or attend school near major roads have an increased incidence and severity of health problems that may be related to air pollution from roadway traffic." In addition, several railroads cross the target area. Rail cars carry various chemicals presenting a constant threat of emergency release, with potentially catastrophic effects on our target area residents. The East Fork Whitewater River passes through our target area and is known to be contaminated with PCBs, bacteria, and other microbes according to the watersgeo.epa.gov, adding to the environmental impacts faced by target area residents. The Whitewater Valley Power Plant is located south of Richmond. It has two active furnace units, one is nearly 45 years old and the other is over 60. Due to the age of these units, a legitimate concern of efficiency and pollutant release exists. These environmental issues are having a noticeable impact on our community. Of the 3,136 counties in the U.S., Wayne County ranked 151st for amount of particulate matter in the air in 2016 (countyhealthrankings.org), placing us in the bottom 5% nationally for air pollutants (particulates).

IV.C.3.1.b.iii. Cumulative Public Health Impacts: Because health related statistics are unavailable at the city level, figures for Wayne County where Richmond is located are included here and are believed to be representative of the health of the City's residents. Sites such as the Glazer Scrap Yard, the 3rd Street Depot, and the Pennsylvania Railroad Depot are known or believed to be impacted by PCBs. Studies on the health effects of exposure to PCBs has been linked to higher incidences of cancer, thyroid conditions, and liver issues. The incidences of all cancers in Wayne County (498.8/100,000) exceed that of Indiana (470.9/100,000) (Indiana State Cancer Registry). In addition, metals and VOC concerns on many of the target area sites may be contributing to residents suffering from asthma in Wayne County, which ranks in the top 20% of Indiana counties for emergency room visits related to asthma. Indiana State Dept. of Health data indicates that Wayne Co's prevalence of lower respiratory disease is 70.3/100k compared to Indiana at 55.4/100k. Wayne Co ranks 4th among Indiana's 92 counties for child blood lead poisoning rate (Indiana State Dept. of Health), likely exacerbated by the large number of older homes in our community as noted above.

VOCs, PCBs, and PAHs at the Pennsylvania Railroad Depot, the 3rd Street Depot, and the Mechanic's Laundry sites may be directly linked to the elevated incidences of cancer. These sites are near parks and low income neighborhoods linking cancer directly to disadvantaged populations.

Similarly, this is true for the Glazer Roundhouse, Glazer Scrap Yard, and the J Street Salvage Yard, located in or near low income neighborhoods, where historical operations may have left petroleum and VOC contamination known to cause cancer. Higher than average respiratory disease and asthma rates are often linked to asbestos which is thought to be present in the 3rd Street Depot, Pennsylvania Railroad Depot, and Mechanic's Laundry properties. The neighborhoods surrounding these sites also have low income residents with an acutely high number of children and elderly living in poverty compared to the balance of the community. Increasing the negative health impacts on residence and the risk of respiratory illness is the close proximity to a coal fired power plant located just south of the city.

Because many of our target area brownfields are near sensitive populations (low income residents and children/elderly below poverty level), brownfields have likely adversely impacted their health (see data above). The presence of brownfields in low income areas and the data above indicate a link between income and health effects, demonstrating the impact brownfields may have on sensitive populations. These populations are less likely to seek medical attention due to limited access to health care, so they are more likely to experience health effects from contaminant exposures.

IV.C.3.1.c. Financial Need, i. Economic Conditions: The City of Richmond needs U.S. EPA's financial assistance to complete brownfield assessments, as we do not have the funds to complete work in our general budgets. Our economy has leaned heavily on our manufacturing history which has seen significant declines over the last few decades. Reduced income tax revenues and declining wages further limit local government resources. We estimate the income tax losses locally to be nearly \$600K. In the past decade, the City has lost large, high paying employers such as those listed on Page 1, resulting in the loss of over 1,150 jobs and an estimated \$1.1M in annual property tax revenue. The City operates on a \$53M annual budget, which is enough to provide essential services and invest in much needed necessary infrastructure maintenance, but leaves little to no funding available for environmental investigations of brownfields. Costs paid from our budget to operate a landfill and an airport, both uncommon municipal expenses, exceed \$3M annually. Our first responder fund portion of our budget saw a massive 72% increase for 2017, which had to be funded through cuts to other critical department funds. This increase is, in part, due to the added costs associated with high crime and drug abuse associated with the Depot District brownfields. All of this impedes the local government's financial capacity to address brownfield redevelopment. Target sites listed in Table 2 add to the financial burden borne by target community residents by suppressing residential property values, further adding to municipal expenditures through reduced tax base and additional public safety services to brownfield sites for criminal activity.

Further, legislation passed by the Indiana General Assembly in 2009 limits property tax rates which greatly reduced tax receipts received by the City. This makes the need to return brownfield properties to the tax rolls even more critical to provide the funds needed to continue to offer essential services to the community. Also in 2009, Indiana ended the brownfields Site Assessment Grant Initiative (SAGI) which previously funded many of the brownfield assessments in Richmond. With a budget focused on providing essential services and infrastructure maintenance, we lack the funds necessary to complete the proactive assessment and planning activities that this grant will provide.

IV.C.3.1.c.ii. Economic Effects of Brownfields: Several socio-economic factors have impacted the Depot District, including loss of jobs and businesses, and redevelopment of brownfield properties. Brownfields in residential areas decrease property values of homes, adding to the economic distress of the area residents who are already struggling. For example, blight surrounding Mechanic's Laundry has resulted in a disinvestment in that area, evident in unimproved homes, often falling into disrepair (shown by very low home values as noted above). Target area residents, already facing the challenges of low income (e.g. Depot District resident income is 70% lower than Indiana per 2015 ACS), are burdened with devaluation of their homes just by being near brownfields. Depot District home values are 41% lower than Richmond as a whole. Moreover, these home values have declined sharply (25%) according to 2010 Census/2015 ACS data. Reduction in tax revenue brought on by job losses, low wages, and poverty, specifically in the target area, added to the other challenges outlined here prevent the City from having the funds to address much needed brownfield redevelopment. Census data indicates that Richmond's Median Household Income, adjusted for inflation, has decreased from 2010 to 2015 by 27.4%, and 2015 ACS data shows 39.6% of the residents are living in poverty. As shown in

Table 1 above, income and financial welfare statistics all indicate that Depot District residents are being crushed under the weight of their financial struggles which are clearly aggravated by the area's brownfields. Simply put, the Depot District has been in a decline for decades, and it is imperative that we find a way to invest in those who live and work there. Brownfields add undue burden on sensitive populations in the target area through blight, property vacancy (40% of the total area of the Depot District), unnecessary use of municipal resources through the need for increased public safety presence (over 3X the police calls per Richmond Police Dept.), and a reduction in area property values further hindering their ability to prosper. Assessment and subsequent cleanup of these brownfield properties are the first steps towards redevelopment and increased property tax revenues on these properties.

As businesses move away or close, vacant commercial and industrial properties often trigger a corresponding increase in the number of vacant or declining residential properties as former workers move away. For example, 28% of the homes in the Depot District are vacant (2015 ACS). This results in depressed residential property values and the desire to not live near the blight and socio-economic disadvantages caused by brownfields. Because of these fiscal and economic challenges (low income, high poverty rate, unemployment, limited tax base, falling property tax revenues) the City's ability to fund the investigation and clean-up of the large number of brownfield sites is very limited. New jobs created by development already underway, as well as redevelopment planned in the Depot District, will lead to new jobs for our residents, increased family incomes, improved living conditions and pride of residential property, less crime and substance abuse, and more stable neighborhoods. Local budgets will also feel less pressure due to new economic development opportunities that increase tax revenue and reduce the need for local financial assistance.

IV.C.3.2. Project Description & Feasibility of Success, a. Project Description, Redevelopment Strategy, & Timing/Implementation, i. Project Description & Alignment with Revitalization Plans:

Richmond is requesting \$300,000 the majority of which will be used to complete Phase I and Phase II ESAs, providing the initial, highest risk investment necessary for brownfield redevelopment. Funding will also be committed to improving/reprioritizing the inventory (which was recently created) and conducting cleanup planning activities. These funds will help us reach redevelopment goals outlined in the Richmond Redevelopment Plans, tackling environmental challenges associated with the highest priority sites within the target area. This approach will allow us to maximize grant value and trigger further environmental and redevelopment work with other funding as noted in the leveraging section.

For example, plans are underway to develop the Pennsylvania Railroad Depot site into a Depot District Economic Development incubator. Unoccupied since 1972, this historic building, one of Indiana's most revered landmarks, was in danger of irreparable decay. However, plans for its repair and revitalization are underway. Plans have launched to encourage economic development and redevelopment entities, and support services to use this site for office space. Putting redevelopment resources in the heart of the target area will set an example and maximize the likelihood of successful growth and development of this struggling area of our City. The Wayne County Economic Development Organization recently moved into the space, triggering the first step in the site's redevelopment vision, but the majority of the building remains vacant. Plans are also in place to use the adjoining Mechanic's Laundry site as a parking lot to support the depot development. Significant investment dollars have already been pledged for the redevelopment of this high priority, high impact site as indicated in the Ability to Leverage section below.

With plans for the Pennsylvania Railroad Depot redevelopment taking shape, a renewed focus on Depot District redevelopment has been kindled. With an investment from the EPA to fund the assessment of the properties considered for expansion, leveraged funding for the effort is much more likely to be realized. This expansion will create high value jobs in the entertainment and accommodations sector, which per Richmond's Consolidated Plan, is the second largest in the City and plays an important role in growing other support sectors such as the food services industry.

Slated for commercial/residential mixed use development, the Glazer Scrap Yard is poised to fill the need for job creation and housing as outlined in the Comprehensive Plan. Additional park space is planned as an end use for certain Depot District brownfields, which also fulfills a need in our Richmond Redevelopment Plans. Creating connectivity between parks, commercial, and residential areas of our city is also planned, meeting goals outlined in our Bicycle and Pedestrian Master Plan.

Brownfield assessments will be linked to successful redevelopment with outcomes, creating more equitable, affordable housing; improving the economic competitiveness of the target area; creating sustainable, mixed-use developments and land recycling opportunities; leveraging current and future investment; and creating unique, healthy, safe, and walkable neighborhoods. This will be accomplished in areas where low income and minority populations are highly concentrated, supporting environmental justice goals. Significant investment dollars have already been pledged for the redevelopment of target area properties as indicated in the Ability to Leverage section below, and we are already beginning to make the outcomes outlined above a reality.

IV.C.3.2.a.ii Redevelopment Strategy: High priority sites in the Depot District, with easy access to entertainment, are well suited for redevelopment, and jobs will be created to support the new businesses in the area. Our plan is to address the redevelopment needs of the Pennsylvania Railroad Depot property first, utilizing the existing historic building for commercial use and the adjoining property (Mechanic's Laundry) to create parking for the Depot. Once complete, this site will become an example of successful redevelopment in the center of the target area. Because the planned reuse is to assemble redevelopment professionals and expertise in the building, this will also create an economic development thinktank where such development is most needed. With the Pennsylvania Railroad Depot redeveloped, an example of success will be in place, and with the initial site investigation funding in place through the EPA grant for other target sites, the often difficult first step of redevelopment will be funded, and private capital can step in to meet the goals of the Richmond Redevelopment Plans. A major north/south thoroughfare and modern utility infrastructure pass by the Glazer Scrap Yard, where a mixed use development with retail/commercial on the ground floor and residential on upper floors is planned, allowing for easy access to commercial development and enabling residents the opportunity to work and live in the same neighborhood. Using the above mentioned sites as models, redevelopment will utilize existing infrastructure such as roads, curb cuts, nearby utilities, and commerce (I-70 and US-40) to attract new investment in area brownfields, reducing redevelopment costs of these sites.

IV.C.3.2.a.iii Timing & Implementation: The City will aggressively begin grant related activities immediately upon confirmation that we have been awarded. The City will work with the EPA Project Manager to prepare grant award materials and complete an EPA approved Work Plan. Once the Work Plan is approved, we will select a qualified environmental consultant in accordance with federal procurement regulations (2 CFR 200.317 through 200.326). The City, with the assistance and support of the public, has already developed a comprehensive brownfield inventory currently containing 58 sites. The City uses the inventory as a tool to help accomplish brownfield redevelopment goals. Inventoried sites are prioritized based on the following criteria (in no particular order): 1) redevelopment potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Community engagement events were held on November 6th and 14th, 2017 to gather public input on the brownfield assessment grant process and review our brownfield inventory. Based on input from those meetings, the existing brownfield inventory was adjusted and will continue to be adjusted as necessary to reflect community needs. Grant tasks will be completed according to the following timeline:

- Before Cooperative Agreement period begins – Environmental Consultant selected through a competitive bidding process compliant with applicable laws (completed by the Richmond Redevelopment Commission)
- 1st Quarter of Grant Period – Quality Assurance Project Plan (QAPP) submitted to EPA for review/approval (by selected environmental consultant)
- 1st- 2nd Quarter of Grant Period – Community input requested through public meeting (by Office of Infrastructure & Development & the environmental consultant)
- Early 2nd Quarter of Grant Period – Brownfield Inventory updated, site prioritization finalized (by Office of Infrastructure & Development & the environmental consultant)
- Early 2nd Quarter of Grant Period – Eligibility Determinations requested & site access obtained and/or confirmed (by Office of Infrastructure & Development)
- 2nd Quarter of Grant Period – Phase I ESAs begin (by environmental consultant)
- 3rd Quarter of Grant Period – QAPP approval & Phase II ESAs begin (QAPP approved by EPA,

Phase II ESAs completed by environmental consultant)

- 1st, 3rd, 5th, 7th, 9th, & 11th Quarters of Grant Period – Community input requested through public meetings (by Office of Infrastructure & Development & the environmental consultant)
- End of 11th Quarter of Grant Period – All Phase I ESAs completed (by environmental consultant)
- 45 days before end of Grant Period – All Phase II ESAs completed and final contractor invoices received (by environmental consultant)
- Throughout the Grant Period – update EPA ACRES database quarterly or more frequently if needed

Because delays early in projects have long term, lingering impacts on schedules through the duration of the project, we will work diligently to assure startup activities are completed per the schedule above. It is the City's intent to allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the cooperative agreement contract. The Cooperative Agreement period is scheduled for 3 years, however, because there is an extremely high demand for assessments in our community, it is very likely that all funds will be spent prior to the end date. The City is proactively communicating with representatives of privately owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and redevelopment. These discussions create a positive dialog between property owners, local government, and impacted citizens. Site access has already been obtained for some of the highest priority sites in Table 2. Prior to applying for site eligibility under the grant, a signed access agreement will be prepared and executed for each site being considered.

IV.C.3.2.b. Task Description & Budget Table, i. Task Description: The City and its environmental consultant (selected in compliance with local, state, and federal procurement requirements), will complete the following tasks:

Task 1: Program Management & Training Support- \$6,300 (\$3,150 each for hazardous substances and petroleum) – A total of \$2,000 in expenses is estimated for city travel to regional and national meetings for periodic training and program management assistance. In addition, a total of \$300 for supplies is budgeted (printed flyers, advertising, etc). The City and its consultant will need to call, meet, and correspond with US EPA staff to manage the grant's cooperative agreement. A total of \$4,000 (or approximately 52 hours over three years at an estimated \$77/hr) has been allocated to this portion of Task 1. In addition, existing funds supporting City staff (\$8,000) and consultant staff (\$4,000) time will be offered in-kind for this task per the Ability to Leverage section.

Task 2: Brownfield Inventory & Prioritization - \$7,000 (\$3,500 each for hazardous substances and petroleum) – The City will use the funds allocated in this task to update the current brownfield inventory, completed by the City, supported by the selected environmental consultant. The City will hold an initial public meeting in the first 6 months of the grant period to gain public input on properties which may need to be added to the inventory and reprioritize inventoried sites. Richmond Redevelopment Plans may be updated based on the revised inventory and priority rankings. The total contractual obligation for this task will be approximately 52 hrs. over 3 years at an estimated \$77/hr. The costs associated with site eligibility determinations will also be included in this task.

Task 3: Phase I Environmental Site Assessments (ESAs) - \$39,000 (\$19,500 each for hazardous substances and petroleum) – The City will contract Phase I Environmental Site Assessment (ESA) activities on key sites throughout Richmond. All Phase I ESAs will be conducted by the selected environmental consultant in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. It is estimated that the costs for completing Phase I ESAs will range from \$2,500 to \$3,500 per site depending on the complexity of the sites. The estimated outputs from Task 3 will include 11-16 Phase I ESAs (5-8 each for hazardous substance and petroleum impacted sites). Although our budget will support 10-16 Phase I's at \$3,500, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in Table 2.

Task 4: QAPP/Phase II ESAs /Site Investigations/Geophysical Surveys - \$206,400 (\$103,200 each for hazardous substances and petroleum) – The City's environmental consultant will prepare a Quality Assurance Project Plan (QAPP), which will be reviewed and approved by the EPA. It is estimated that the costs for completing a typical Phase II ESA will range from \$20,000-\$40,000 per investigation

depending on the complexity of the sites and the environmental conditions identified in the preceding Phase I ESAs. The estimated outputs for Task 4 will include 6-10 Phase II ESAs (3-5 each for hazardous substances and petroleum impacted sites). However, as with Task 3, we recognize that several of our high priority sites are large and may require significant grant funding investment. If true, fewer Phase II's will be completed.

Task 5: Clean-up Planning: \$30,000 (\$15,000 each for hazardous substances and petroleum) – The City will commit funds from this task to complete, in cooperation with the environmental consultant, an estimated 5-10 site specific clean-up plans/documents (estimated \$3,000-\$6,000 each) such as the following: Analysis of Brownfield Cleanup Alternatives, Remedial Action Plans, site closure letter requests (Site Status Letters, No Further Action Letters, etc.), Comfort Letters, and clean-up funding development (see Ability to Leverage below).

Task 6: Community Outreach & Involvement: \$11,300 (\$5,650 each for hazardous substances and petroleum) – Involvement of key stakeholders (residents and business owners near brownfields, investors, brownfield site owners) and the public is integral for a successful brownfield redevelopment program. The City will use the funds allocated in this task to facilitate community outreach and involvement. Assistance from the environmental consultant will be sought for technical aspects of the community outreach program and a PR firm will be engaged to help coordinate outreach efforts. These costs will fund coordinating/conducting community outreach programs and meetings, develop and maintain social media outlets and other online media, and the costs to prepare, print and mail project and site information and marketing documents. These tasks will provide information and input on the progress of brownfield investigation and cleanup planning activities to the public as well as marketing sites for future development. Richmond will hold 4-6 public meetings during the grant period to update the community on the brownfield assessment progress and seek public input and involvement.

non responsive



IV.C.3.2.c. Ability to Leverage: The City will pursue many different funding sources from the State, and Federal levels in addition to the private sector to use as leveraging as outlined in Table 4 below.

Table 4 – Leveraging Resources

STATUS	SOURCE	PURPOSE/ROLE	AMOUNT (\$)
SECURED*	City of Richmond	In-kind services to manage the cooperative agreement	\$8,000
	Indiana Blight Elimination Program	Evaluation & demolition of 150 blighted properties in Richmond	\$1.9M
	Richmond Redevelopment Commission	Rehabilitation of the Pennsylvania Railroad Depot	\$500K
	Tax Increment Financing	Funding pledged by the City to aid in the redevelopment of brownfields	Up to \$250K
PENDING	Richmond Urban Enterprise Zone	State tax benefits for Zone businesses, investors, and residents including tax credits, incremental property tax breaks, and loan interest credits for loans	Estimated \$100K+
POTENTIAL	Env. Consultant	Assisting with ACRES submissions, quarterly reporting, and coordinating/implementing public meetings with stakeholders.	\$4,000
	EPA	Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield redevelopment goals of the City	\$300K-\$1M
	Federal Highway Administration	Infrastructure improvements like streets & pedestrian/bicycle pathways	Estimated \$5M+
	Indiana Economic Development Corp.	Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower.	Estimated \$1M+
	Indiana Brownfields Program	Low-interest/partially-forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund	Estimated \$1M
	Indiana Brownfields Program	SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites.	\$500K+
	Indiana Brownfields Program	Section 128A funding may be used to complete the investigation of sites identified and partially assessed in this Grant.	Estimated \$75K
	Excess Liability Trust Fund	State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks	Up to \$2M
	Private Funding	Remediate sites ineligible for state/federal funding. Such sites may need encouragement and redevelopment support from the City to conduct necessary clean-up prior to redevelopment.	Unlimited
	Liability Insurance Funding	Indiana courts have rule that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Further explanation on this funding source below.	\$1M-3M

*Documentation of secured funding is included in Narrative Attachment I.

Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The City will make efforts to apply this funding source to all eligible sites. The funding is only limited by insurance policy dollar caps (often \$1-3M). Insurance recovery is not limited to municipally owned properties. This funding strategy has been successfully used as leveraged dollars coupled with EPA assessment funding on brownfields in many communities in Indiana (e.g. Plymouth, Logansport, Jeffersonville), commonly leveraging hundreds of thousands, or even millions of dollars in assessment and cleanup funding. Richmond intends to seek additional funding from the following sources: US Dept. of Agriculture, Community Development Block Grant, US Economic Development Administration, Dept. of Transportation grants, and new funding opportunities/incentives available in the future.

The City has a history of leveraging investment in projects throughout the community. We were awarded three EPA Brownfields Grants in the 2000's (2003, assessment; 2007 & 2008, cleanup). 100% of the funds were strategically expended on each of these grants, and we use the 2 cleanup grants

to successfully leverage over \$200K to develop a park property that serves as a key component in a 70-mile rails-to-trails project. More investment is planned, focusing now on our Depot District.

These projects indicate how we use non-local funds to stimulate redevelopment. Without EPA funding for the initial high risk environmental assessment of these sites, brownfield redevelopment will be much less successful. As properties are assessed, the Coalition work in partnership with many agencies and entities to fill in funding gaps, ensuring successful redevelopment. A detailed funding plan will be developed for brownfield sites/areas as assessment projects develop. Each site will have a unique funding plan due to individual status and eligibility.

IV.C.3.3. Community Engagement & Partnerships, a. Engaging the Community, i. Community Involvement Plan:

Richmond has a well-established culture of community involvement that we will maintain throughout implementation of this grant. Our community engagement campaign has already begun, reaching out to business owners in the Depot District (four have even provided letters of support included in Narrative Attachment II). Four to six public meetings will be held to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, and redevelopment planning. Public meetings will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. While Richmond does not have a significant non-English speaking population, the City has multi-lingual personnel on staff who are available upon request to interpret presentations or translate documents. We've already begun engaging target area residents, business owners, and community advocates to solicit their input regarding our brownfield redevelopment project, and will continue to do so throughout the grant period. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the City, the Redevelopment Commission, and the Chamber of Commerce to bring awareness of the redevelopment opportunities the priority sites offer. When developers are identified, they too will attend public meetings to describe their plans for redevelopment. Stakeholder input will be cataloged for use as a reference when determining assessment and redevelopment priorities, ensuring that the information provided by those directly impacted by brownfield sites in the target area will be incorporated into the prioritization and redevelopment process. As appropriate, we will utilize visioning sessions offered by the Kansas State TAB program to maximize the incorporation of community input.

IV.C.3.3.a.ii. Communicating Progress: The City understands the importance of communicating the progress of EPA Assessment Grant activities. A communication plan has already been developed and put into motion. Public meetings were held on November 6th and 14th, 2017 to communicate with the public and stakeholders about the brownfield assessment grant, inventory, and proposal progress. Upon notification of the EPA grant award, the City will notify the public through media releases to local radio/TV stations, newspapers, websites, Facebook, Twitter, and other social media outlets. We will continue to use these communication outlets throughout the grant period to ensure that target area residents and communities are aware and involved in the progress of our brownfield redevelopment initiative. Taking advantage of multiple media technologies will allow us to communicate with all age groups and demographics in the target area and provide the best opportunities for all to be informed of the project progress.

IV.C.3.3.b. Partnerships with Government Agencies, i. Local/State/Tribal Environmental Authority: Richmond has developed long standing partnerships and working relationships with the following government agencies:

- Indiana Brownfields Program will prepare/provide Eligibility Determinations (petroleum sites), Site Status Letters, Comfort Letters, interpreting Due Care requirements, grant/loan funds, guidance & expertise, and develop plans to support redevelopment including remediation strategies that integrate site design which will reduce costs. Each petroleum site will be enrolled with IBP when eligibility is determined, and hazardous substance sites will be enrolled at various points in the process such as

when Site Status Letters or Comfort Letters are requested.

- The Indiana Department of Environmental Management (IDEM) will prepare/provide Petroleum Eligibility Determinations, site and UST closure documentation, Voluntary Cleanup Program participation/support, ELTF funding (for LUSTs), guidance & expertise. IDEM has lent their support for the brownfield redevelopment through an acknowledgement letter indicating that the City is a good candidate to receive EPA Assessment Grant funding (Cover Letter Attachment II).

IV.C.3.3.b.ii. Other Governmental Partnerships: The City will work with other relevant federal, state, and local governmental agencies including the following:

- Wayne County Health Department/Agency for Toxic Substances & Disease Registry (ATSDR):
The City has a strong relationship with the Wayne County Health Department, and will leverage their expertise to perform an appropriate response as it relates the health department's mission to protect human health. As health concerns are identified in areas near known brownfields, assessment data will be shared with the Health Department to help correlate site contaminants to the health of residents. A plan will be developed to reduce the risk to area residents and provide a safer community. To maximize the health benefits afforded to the target area residents, we may contact ATSDR for technical assistance and resources to support public health assessments and other studies to prevent exposures and disease related to toxic substances.
- DOT – Provide funding for infrastructure improvements such as surface transportation improvements, bike/pedestrian transportation infrastructure, safety, and accessibility.
- HUD – Provide funding for community planning and development including multifamily housing and single family housing including affordable housing funding.
- EPA – Eligibility Determinations (hazardous substance sites), Grant funds, guidance & expertise.
- Wayne County Soil and Water Conservation Dist. – Provide leadership in conservation and development of soil, water, and related resources; help implement soil/water conservation practices.
- WorkOne – Subsidiary of the IN Dept. of Workforce Development; develops opportunities for employers and job seekers to improve the region's workforce through job placement assistance, workshops, and training. We will work with WorkOne to place qualified candidates with companies seeking to fill jobs in environmental investigation, remediation, and site redevelopment.

IV.C.3.3.c. Partnerships with Community Organizations, i. Community Organization Description & Role: Several community based organizations have pledged a supporting role for the City's brownfields program (Table 5). This assemblage of community partners is best suited to reach out to residents and stakeholders because of the breadth of their expertise. This group has regional influence and local ties, maximizing the benefits they bring to the project.

Table 5 – Community Based Organization Partners

Economic Development Corp. of Wayne Co. – Economic development organization that will assist to identify brownfield properties in the target area, circulate information about community outreach events, provide meeting space for outreach events, and provide input on planned redevelopment
Preserve Richmond, Inc. – grass roots organization committed to sustainable development through preservation of historic resources. They will support historic preservation in the target area, help identify brownfield properties, circulate information about planned public meetings/events, provide meeting space, and provided input on planned redevelopment
Earlham College – higher education institution that will educate students in environmental affairs through STEM courses. They will also assist with promoting and maintaining a revitalized commercial and residential Depot District.
Historic Depot District – community organization dedicated to restoring and renewing the Depot District that will identify brownfield properties in the Depot District, circulating information about planned brownfield public meetings and events, and providing our input on planned redevelopment in the area.
City Center Development Corp. – neighborhood organization dedicated to maintaining a vibrant commercial and residential Depot District who will assist to identify brownfield properties in the target area, circulate information about community outreach events, provide meeting space for outreach events, and provide input on planned redevelopment
Reid Health – local hospital that will assist in identifying brownfields and areas where redevelopment opportunities exist
Ivy-Tech College – higher education institution that will advocate for historic preservation in the Depot District, environmental job training, provide input on planned redevelopment, circulate information about planned public meetings.

In addition, the following business organizations have become involved in the Depot District brownfields redevelopment process and have provided letters of support (Narrative Attachment II) for this effort: Model T Club of America, Richmond Furniture Gallery, Melton Renzulli Wines & The

Cordial Cork, and Roscoe's Coffee Bar & Tap Room.

IV.C.3.3.c.ii. Letters of Commitment: Letters of Commitment from community organizations are included as Narrative Attachment II.

IV.C.3.3.d. Partnerships with Workforce Development Programs: There are no U.S. EPA Environmental Workforce Development/Job Training programs in the Richmond area. We will encourage consultants and their subcontractors to work with WorkOne (section 3.b.ii) to employ qualified Richmond residents for certain project work and to involve interns from Earlham College and Ivy Tech Community College pursuing environmental and STEM related degrees.

IV.C.3.4. Project Benefits, a. Welfare, Environmental, & Public Health Benefits: EPA grant funding will be used, primarily, to complete Phase I and II ESAs. We will also update our brownfield inventory, plan for cleanup, and take a step toward sustaining and restoring Richmond and the ecological systems that support our community. Environmental conditions, including potential soil and water contamination (PCBs, metals, petroleum, pesticides, herbicides, VOCs, PAHs, glycols, asbestos, etc.), and environmental justice issues resulting from these conditions at Depot District sites will be addressed. Assessment and subsequent remediation and redevelopment will result in new commercial facilities and retail space which will support other industrial and entertainment sectors, new housing development, and new park amenities. The Pennsylvania Railroad Depot will become a thriving thinktank developed with the purpose of stimulating more Depot District development. The Mechanic's Laundry site will become a parking lot to support the depot. The development vision for these two properties will anchor redevelopment efforts for the entire target area, providing unlimited opportunities to improve the local economy through job creation, especially for low income residents in the Depot District. With these developments, the City will diversify its workforce, creating a trickle-down effect to job creation, and becoming more attractive to new industry and business. It will add jobs to our community, the Depot District, and surrounding areas, resulting in lower unemployment and increased household income. Recreational amenities will promote and improve Richmond residents' lifestyles and provide more opportunities for overall health improvements. Reduced crime will result in safer neighborhoods and more tax revenues, which will improve local education and public services. Richmond's underserved areas and sensitive populations will benefit from blight removal, new job opportunities, higher wages, and more convenient transportation.

The City is already investing in the target area to re-use and modernize infrastructure to supply redeveloped brownfield sites with the necessary support. This will provide the sites with sustainable redevelopment potential. Opportunities exist to create modern eco-industrial and residential developments, particularly on the Glazer Scrap Yard site and surrounding the Pennsylvania Railroad Depot. The City already has an Environmental Sustainability Commission who promotes sustainable development and natural resource conservation. As the bicycle and pedestrian trail plans are implemented, there is great potential for sustainable redevelopment which does not increase demand for automobile travel. A partnership with the EPA and Richmond through the award of this grant is a critical step toward future green infrastructure investment by both the public and private sectors.

The City has hundreds of sites impacting the environment in our community, many of which are known to be contaminated (e.g., 11 sites requiring cleanup per EnviroFacts). The cumulative environmental impact to our City, especially in the Depot District, is not known. However, chronic exposure to contaminants, blight, crime, and other challenges brought by brownfields have inevitably damaged the soil and groundwater in the target area. This grant will help our community clarify the environmental conditions on vacant and underutilized sites, to reduce the risk of exposure, eliminate sources of contamination, improve the ecological health of our community, and incorporate livability and equitable development principles. For example, redevelopment of the 2 depots and the roundhouse will eliminate exposure to commonly found chemicals on railroad properties (pesticides, herbicides, metals, PAHs); reduce risk to low income residents and children; and remove likely risk for cancer and other health impacts. This also will eliminate known locations for illicit activity, reducing crime.

Assessment and cleanup of brownfields is part of the City's strategy to improve the quality of life for all residents and promote reinvestment in existing commercial areas and neighborhoods. The priority sites identified in this application represent examples of this strategy, and the City is leveraging the potential value of these sites. Multi-million-dollar public investments have and will continue to

promote these properties for new private investments. Richmond's local initiatives, coupled with the assistance of the IBP and EPA, will enable the City to eliminate multi-decade property development barriers so that new private sector investment and private sector job creation can be fostered.

IV.C.3.4.b. Economic & Community Benefits: End-use redevelopment of brownfields will generate more tax revenue for the City. Through increased investment, jobs will be created, new residential units will be constructed, and property values will be enhanced. According to the Northeast-Midwest Institute (2008), public investment plays a vital role in local economic benefit. Results of the study show that every \$1.00 of public funds invested leverages \$8.00 in total investment. Furthermore, the study concluded that for every acre of redeveloped brownfields used, 4.5 acres of greenfields are preserved, lowering the cost of development and infrastructure. A partnership between the City and the EPA through this grant would allow the City to grow the local economy through such a return on investment. For example, redevelopment of the 3rd Street Depot & Railroad Siding will remove the stigma associated with environmental contamination (asbestos, metals, PAH's, etc.). Blight will be eliminated, removing the lure of crime abandoned property has proven to invite (3X more criminal activity around Richmond's brownfields). This site could again become a viable asset to the community once its redevelopment into a park is complete. Temporary jobs would be created through construction work to remediate and redevelop the site. Development of the park will stimulate other area investment from the private sector, creating permanent jobs in the surrounding area. Affordable housing and jobs would be created with the redevelopment of the Glazer Scrap Yard, and many permanent jobs would be created with the light industrial/commercial redevelopment of the Former J St. Auto Parts site. As brownfields are redeveloped, the employment and revenue losses will be reversed and economic growth will multiply in the community. If all Table 2 properties are redeveloped, nearly 100 jobs are expected to be created and an estimated \$55K in annual income tax revenue will be generated. Additionally, since this target area is in a designated Tax Increment Financing district, incremental increases in property, gross retail sales and state/local payroll taxes will be retained for redevelopment purposes by the City. By our calculations, this could generate up to \$1.7M in annual incremental tax revenue which could be reinvested in the Depot District. With an investment from the EPA to fund the assessment of the properties considered for redevelopment, leveraged funding for the effort is much more likely to be realized. Redevelopment will create high value jobs, affordable housing, and recreational amenities, all important needs outlined in the Richmond Redevelopment Plans.

IV.C.3.5. Programmatic Capability & Past Performance, a. Audit findings: The City has an excellent record of managing grants and has not received an adverse audit related to federal, state, or local grants.

IV.C.3.5.b. Programmatic Capacity: The City's Department of Infrastructure & Development (DID) will manage this grant. This office has previously managed three EPA Assessment and/or Cleanup Grants (FY03, FY07, FY08) and many other economic development resources valued at well over \$50M over the past 15 years. The DID staff, along with other city staff, have the technical, financial, and administrative ability in place to implement this grant project successfully. Jack Cruse, Director of the DID will serve as the City's Project Manager. Cruse has been with the City for 6 months. Prior to his work in Richmond, Mr. Cruse served 26 years in the U.S. military and the Dept. of Defense where he managed large construction projects, including a \$15M force protection. Since his tenure in Richmond, Cruse and has been integral to the progress made to redevelop the Pennsylvania Railroad Depot, the execution of the \$1.9M blight elimination effort (see leveraging), and other redevelopment success stories in Richmond where he provided a similar role. Under Mr. Cruse's supervision, the DID is responsible for preparing, implementing and enforcing plans and regulatory tools that guide future growth, enhancement, and preservation of our city. He is also responsible for several local grant and incentive programs such as the Richmond Urban Enterprise Association program. Cruse will be assisted by Tammy Tidrow, Community Development Specialist & Grant Writer, who has extensive experience managing all grant activities for the City. Both Cruse and Tidrow will aggressively use their previous brownfield redevelopment and economic development experience to seek redevelopment opportunities for those sites without secured redevelopment contracts. Beth Fields, Richmond City Controller, will serve as the Grant Financial Manager, and will be responsible for accounting and

financial reporting. She has provided these services on many other grant and loan programs benefiting the City. Ms. Fields will be assisted by Deputy Controller Emily Palmer. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the City's team will allow for a seamless transition to other experienced members. This level of involvement will allow for another member of the team to assume project management duties if it becomes necessary. City staff has a history of working cooperatively with state and federal environmental agency personnel and engaging qualified environmental consultants. This team will be supported by other city departments including planning, finance, utilities, engineering, the legal department, and the office of the mayor. Through a competitive bidding and procurement process, the City will select an environmental consultant with experience with EPA Brownfields Grants and working with IDEM/IBP. The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed three-year project period.

IV.C.3.5.c. Measuring Environmental Results: Anticipated Outputs & Outcomes: Tracking, measuring, and evaluating progress will be achieved through meeting minutes, Quarterly and Annual Reports, quarterly review/analysis of any grant performance encountered/identified in Quarterly Reports, completion of Work Plan tasks, and participant evaluations of the project programs. The grant will have the following outputs: the updated Brownfield Inventory, three to six public meetings focused on progress of this grant, completion of an estimated 10-16 Phase I ESAs, completion of 6-10 Phase II ESAs, completion of 5-10 clean-up planning tasks, and a plan will be developed to fund any additional investigation and/or remediation work needed to return assessed properties to active reuse. Further, the Assessment Grant will have the following outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels, acreage made ready for greenspace/recreation, and leveraged monies. These and other output/outcome statistics will be included in quarterly reporting and ACRES submittals as data becomes available through the duration of the grant period, which will allow the EPA to better evaluate and highlight the grant program success. At the close of the project, the City will provide a final report to the EPA and the community summarizing project outputs and outcomes.

IV.C.3.5.d. Past Performance & Accomplishments, i. Currently or Has Ever Received an EPA Brownfields Grant, 1. Accomplishments: The City received and successfully managed three EPA brownfields grants, the most recent being a FY08 Cleanup Grant (\$200K) for the cleanup of the Indiana Gas Building, a site listed on National Register of Historic Places. Located in the Whitewater Valley Gorge, remediation activities were completed on the site which was redeveloped as an extension of the Gorge Trail, a valuable recreational/natural amenity in our community with linkage to the 70-mile-long Cardinal Greenway Trail. All goals and objectives outlined in the work plan were met. The FY03 Assessment Grant was used to complete a series of investigations to assess the Starr Gannett area of Whitewater Valley Gorge. The FY07 Cleanup Grant funded remediation on the 13-acre Starr Gannett site, which, like the Indiana Gas site, was developed into trail. At the time of this proposal submission, outputs and outcomes from the FY08 grant are accurately reflected in the ACRES system.

IV.C.3.5.d.i.2. Compliance with Grant Requirements: As stated above, all Work Plan goals, outputs, and outcomes of the previous EPA Brownfields grants were achieved, and all reports including Quarterly Reports, Annual Reports, MBE/WBE Utilization Reports, ACRES submissions, etc. were completed in a timely manner. The City was fully compliant with the terms and conditions of the previous Cooperative Agreements. 100% of the funds were expended and the grants are now closed, putting the EPA grant funding to work in our city and making these projects a major success.

As in the previous grant, Richmond has a clear plan in place to aggressively address the targeted brownfields in the community, and firm leveraging commitments to redevelop sites into viable assets for the community. Due to budget constraints, lower tax revenues, and pressures to complete projects necessary to maintain our infrastructure, EPA grant funding is the only way we will be successful in aggressively pursuing brownfield assessment, cleanup, and redevelopment.

NARATIVE ATTACHMENTS

- I. Firm Leveraging Resources
- II. Letters of Commitment from Community Organizations

NARRATIVE ATTACHMENT I



CITY OF RICHMOND

DAVID M. SNOW

Mayor

DEPARTMENT OF INFRASTRUCTURE & DEVELOPMENT

50 NORTH FIFTH STREET - RICHMOND, IN 47374

PHONE (765) 983-7584 - FAX (765) 962-7024

November 6, 2017

Mr. Jack Cruse
City of Richmond
Director, Department of Infrastructure and Development
50 North 5th Street
Richmond IN 47374

RE: Secured Leveraging for EPA Brownfields Assessment Grant

Dear Mr. Cruse:

In support of the EPA Brownfields Assessment Grant application effort, I am pleased to outline the following investments that have been secured and will be used to leverage redevelopment of brownfield sites in our community:

1. The City will provide approximately \$8,000 worth of in-kind services such as staff time to manage the cooperative agreement (e.g. meetings with the environmental consulting team, preparation of community outreach materials, social media updates, etc.), meeting facilities, educational materials, and other items needed to successfully execute the grant agreement.
2. The City was awarded \$1,900,000 in grant funding from the Indiana Blight Elimination Program to demolish 150 blighted properties in Richmond. This funding will provide a valuable step forward in the redevelopment of our most economically distressed neighborhoods.

We look forward to putting these investments to work in our community. Combining the investments listed above with the very important EPA Brownfields Grant program funds, we will have the pieces in place to make great strides in community redevelopment in Richmond.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Snow", with a stylized flourish extending to the right.

Dave Snow, Mayor
City of Richmond, IN

November 6, 2017

Mr. Jack Cruse
City of Richmond
Director, Department of Infrastructure and Development
50 North 5th Street
Richmond IN 47374

RE: Secured Leveraging – Pennsylvania Railroad Depot Brownfield Redevelopment

Dear Mr. Cruse:

The Pennsylvania Railroad Depot, located in the heart of our city's Depot District, has had an uncertain future since the railroad ceased operations there in 1972. Built in 1902, it's design was intended to make a memorable impression on railway passengers as well as city residents. Despite its architectural beauty, the building has been listed on Indiana Landmark's 10 Most Endangered list multiple times.

Because of its historical and architectural significance, great effort has been made to find a reuse for this building before deterioration made its restoration impossible. Finally, in 2016, the site was purchased by the Better Homes and Gardens First Realty, a local real estate firm. To aid in the repairs and renovation, the Richmond Redevelopment Commission provided \$500,000 to be invested in the building through a forgivable loan.

Recently, the Wayne County Economic Development Corporation moved into a small portion of the newly renovated area of the building, adding to the redevelopment minded building occupants and laying the groundwork for a development incubator. We are hopeful that more tenants such as the EDC make this their business home. The plan for the depot is great news for Richmond's historic Depot District. Anchored by its namesake landmark and listed in the National Register of Historic Places, the commercial district on Richmond's north side is developing as a popular local business district, with retail, restaurants, a coffee house, etc.

The Richmond Redevelopment Commission is proud to provide this secured redevelopment funding. The future of the Depot District looks bright, and we are excited to continue the redevelopment momentum anchored by the Pennsylvania Railroad Depot.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kathy Lucid", written in a cursive style.

Kathy Lucid
President, Richmond Redevelopment Commission

November 14, 2017

Mayor David Snow
City of Richmond
50 North 5th
Richmond, Indiana · 47374

RE: TIF Funding/Firm Leveraging – Brownfields Redevelopment

Dear Mayor Snow:

The Richmond Redevelopment Commission (RRDC) is resolute in its efforts to address brownfields in our community. The receipt of United States Environmental Protection Agency (EPA) Brownfields Assessment Grant is a critical tool to accelerate our plans to redevelop our areas of most need. As a part of the grant application, the RRDC understands that City must leverage additional funds/resources to support the grant project. We believe that EPA grant funding will be an extraordinary benefit to the City, and even the region and would like to offer support for the project.

The RRDC operates several Tax Increment Financing (TIF) districts, including one that encompasses the area of our community most heavily targeted for EPA grant funding investment. TIF funding can be used for infrastructure improvements projects surrounding these sites. Infrastructure projects may include new sidewalks, water lines, sanitary sewer upgrades, roads, et cetera. Our TIF program would support redevelopment activities in the target community by providing funding for these infrastructure improvements.

The RRDC is willing to commit, as appropriate, to utilizing these programs to support redevelopment of brownfields that are assessed using the Assessment Grant funds. Once the EPA grant funding is invested to fund the high risk, upfront cost of Phase I and Phase II Environmental Site Assessments, we will follow it with an investment of up to \$250,000 in TIF funds for infrastructure to complete redevelopment.

The RRDC looks forward to this opportunity and using TIF funding to support the redevelopment of brownfields in our community.

Sincerely,

A handwritten signature in cursive script, reading "Kathy Lucid".

Kathy Lucid
President, Richmond Redevelopment Commission



November 10, 2017

Mayor Dave Snow
50 North 5th Street
Richmond, IN 47274

Dear Mayor Snow,

Historic Comprehensive General Liability (“CGL” a.k.a. “slip & fall”) policies for the purpose of paying for Third Party property damage as a result of environmental issues, is a means of funding for sites in Indiana, large and small. This is particularly true when you combine this “hidden asset” with EPA Brownfield’s Assessment grants so that development does occur.

Restorical Research’s (“RR’s”) unique approach is to help our clients find the funds to address environmental issues by finding the above-mentioned policies or evidence that they exist. Indiana courts have consistently ruled that CGI policies may afford coverage to respond to action brought by the Indiana Department of Environmental Management (IDEM) or local governments calling for the investigation and clean-up of polluted properties. Most policies, and even some issued in the last few years, fall into this category where insurance funding maybe available. In most situations, the property damage limits under these policies far exceed the cost of clean-up. Nevertheless, the more policies the better, and finding the primary, secondary or tertiary evidence of CGL policies that supports claims is a skill and expertise that has evolved over 15 years. RR has performed its craft for over 300 projects, in 14 States, many of which have been in Indiana.

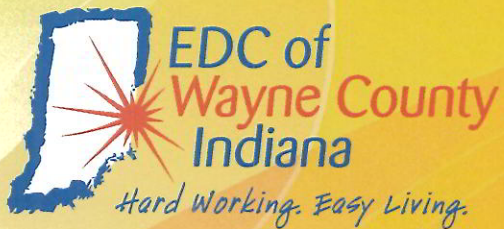
There are hundreds of sites in Indiana where this approach has been successfully implemented, including a privately-owned site in Michigan City, Indiana. To date, approximately \$1,000,000 has been leveraged through insurance proceeds to perform investigation and remediation activities on this property. This site provides a perfect illustration of RR’s unique approach and how third-party funds can be used to leverage more dollars toward your overall assessment and redevelopment program.

The very same solution is available for the City of Richmond as well as privately owned sites, including many of the inventoried brownfields. Remember, old CGL policies are very valuable assets. They should be kept in a safe place. If you have any questions or would like additional information, feel free to contact me at your convenience.

Sincerely,

Dave Valinetz, Principal
Restorical Research, LLC

NARRATIVE ATTACHMENT II



November 8, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

The EDC of Wayne County, Indiana is excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

The EDC of Wayne County, Indiana is a not-for-profit organization dedicated to maintaining a vibrant commercial and residential area in Richmond (depot district) target area by advocating for historic preservation, promoting small business and encouraging community involvement. Our goal is to gain support for the preservation/restoration of Richmond (depot district) target area, and specifically the commercial district located on Fort Wayne Avenue. and North E./10th Street. We would love to have a thriving and revitalized Richmond (depot district) target area with our existing historic buildings.

The EDC of Wayne County, Indiana is happy to assist the Coalition by identifying brownfield properties in the Richmond (depot district) target area, circulating information about planned brownfield public meetings and events, providing meeting space for grant related public meetings, and providing our input on planned redevelopment in the area.

We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,

A handwritten signature in dark ink that reads "Valerie Shaffer".

Valerie Shaffer
President



PRESERVE Richmond, Inc.

P. O. Box 1873
Richmond, IN 47375-1873

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

November 12, 2017

Dear Mayor Snow:

As President of Preserve Richmond, Inc., I am excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of Richmond.

Preserve Richmond Inc. (as a not-for-profit/for-profit organization) is dedicated to maintaining a vibrant commercial and residential area in Richmond's (depot district) target area by advocating for historic preservation, promoting small business and encouraging community involvement. Our goal is to gain support for the preservation and restoration of the Richmond (depot district) target area, and specifically the commercial district located on Fort Wayne Avenue, North E. and 10th Street. We anticipate a thriving and revitalized Richmond (depot district) target area with our existing historic buildings with the application for the Brownfield Assessment Grant.

I am happy to assist the Coalition by identifying brownfield properties in the Richmond (depot district) target area, circulating information about planned brownfield public meetings and events, providing meeting space for grant related public meetings, and providing needed input on planned redevelopment in the area.

We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,

Lynn L. Johnstone
President, Preserve Richmond, Inc.
P. O. Box 1873
Richmond, IN 47375

Earlham

COLLEGE

Office of the President

November 15, 2017

The Honorable Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, Indiana 47374

Dear Mayor Snow:

Earlham College is excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our community.

Earlham College is a nationally-ranked liberal arts college with a reputation for excellence in teaching and preparing students to make a profound, positive difference in the world. Earlham is also dedicated to maintaining a vibrant commercial and residential areas in Richmond, including the Historic Depot District. A vital part of both our curriculum and our general ethos is to help our students explore and engage with the local community. Our students are drawn to this particular neighborhood for its many local shops and restaurants. From their perspective, and that of our faculty, it is incredibly exciting to see this area being revitalized even further.

It is my belief that Richmond and Earlham have a mutually dependent relationship. As Richmond grows and thrives, our prospective students are more likely to become enrolled students, our faculty move closer to campus and become involved in the community, and our students are more likely to call Richmond home after graduation.

The success of Richmond means the success of Earlham. Which is why I wholeheartedly support this application. We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,



Alan C. Price
President, Earlham College



November 15, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

The Historic Richmond Depot District Association (HRDDA) is excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

The officers and members of the HRDDA are dedicated to maintaining a vibrant commercial and residential area in Richmond's Depot District by advocating for historic preservation, promoting small business and encouraging community involvement. Our goal is to gain support for the preservation and restoration of Richmond's Depot District, and specifically the commercial district located on Fort Wayne Avenue and North E Street between 8th and 10th Streets. We want the momentum for a thriving and revitalized Richmond Depot District to continue.

The HRDDA is happy to assist the Coalition by identifying brownfield properties in the Depot District, circulating information about planned brownfield public meetings and events, and providing our input on planned redevelopment in the area.

We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,

Susan Yaeger
President
Historic Richmond Depot District Association

CENTER CITY

DEVELOPMENT CORPORATION

"Facilitate. Advocate. Empower."

Board Members

Ali Carter-Rivera *President*

Phil Quinn *Vice President*

Ben Brock *Treasurer*

Mary Jo Clark

Beth Fields

Nancy Green

Sharrie Harlin

Lynn Johnstone

Michelle Malott

Brent Mather

Rob Tidrow

Melissa Vance

Robin Weinert

Melinda Wilson

Scott Zimmerman

Executive Director

November 7, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

Center City Development Corporation (CCDC) is excited to support the City of Richmond's application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

CCDC is a not-for-profit organization dedicated to maintaining a vibrant commercial and residential area in Richmond's Historic Depot District target area by advocating for historic preservation, promoting small business and encouraging community involvement. Our goal is to gain support for the preservation/restoration of this target area, and specifically the commercial district located on Fort Wayne Avenue and North E./10th Street. We would love to have a thriving and revitalized depot district with restored historic buildings.

CCDC is happy to assist the Coalition by identifying brownfield properties in the target area, circulating information about planned brownfield public meetings and events, providing meeting space in The Innovation Center for grant related public meetings, and providing our input on planned redevelopment in the area.

We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,



Scott Zimmerman



November 15, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

Reid Health is proud to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant for Richmond's historic Depot District. Both as the region's primary health care provider and largest employer, we are committed to improving the quality of life for the citizens of our city and region. A population enjoying a superior quality of life helps maintain health and wellness, while also assisting with recruitment and retention of our highly skilled work force.

Richmond's Depot District is developed into a unique and vibrant area of our region with growing small business, tourism, retail, and restaurant offerings. However, much more potential exists and more improvement is needed. Reid Health will be glad to assist in supporting continued preservation and restoration of Richmond's historic Depot District, specifically, the commercial district located on Fort Wayne Avenue and North 10th Street. The beautiful historic buildings in this area provide great opportunity for further improvement.

Reid Health is ready to partner with the Coalition and assist as needed. For example, our leadership can be helpful by identifying opportunities for area improvement and expansion, particularly to promote improved health, wellness, and quality of life.

We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,

Angie Dickman
Vice President



50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

Ivy Tech Community College- Richmond is excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

Ivy Tech Community College- dedicated to maintaining a vibrant commercial and residential area in Richmond (depot district) target area by advocating for historic preservation, promoting small business and encouraging community involvement. Our goal is to gain support for the preservation/restoration of Richmond (depot district) target area, and specifically the commercial district located on Fort Wayne Avenue and North E/10th Street. We would love to have a thriving and revitalized Richmond (depot district) target area with our existing historic buildings.

Ivy Tech Community College-Richmond is happy to assist the Coalition by identifying brownfield properties in the Richmond (depot district) target area, circulating information about planned brownfield public meetings and events, and providing our input on planned redevelopment in the area.

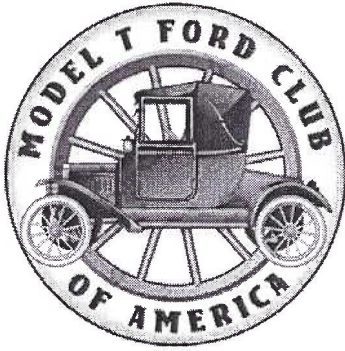
We look forward to working with the Coalition throughout this project to enhance the future of this great community.

Sincerely,

Chad Bolser
Chancellor
Ivy Tech Community College-Richmond

ULEVARD
1A 47374-1220
56
3741

ge.



MODEL T *Ford*
CLUB of AMERICA
P.O. Box 996, Richmond, Indiana 47375-0996

November 15, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow:

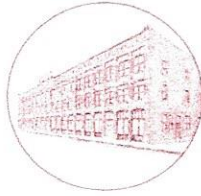
The Model T Ford Club of America and Model T Museum are excited to support the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

We are anxious to see the continued development of Richmond's Depot District. We want to partner with and promote the small businesses and encourage community involvement. Our goal is to gain support for the preservation and restoration of Richmond's Depot District, and specifically the commercial district located on Fort Wayne Avenue and North E Street between 8th and 10th Streets and between North C and E Streets. We want the momentum for a thriving and revitalized Richmond Depot District to continue.

We look forward to improvements that will continue to make the Depot District a destination point for visitors and impact economic growth for Richmond.

Sincerely,

Susan Yaeger
Executive Director
MTFCA and Model T Museum



Richmond Furniture Gallery
180 Fort Wayne Avenue
Richmond, IN 47374
(765) 939-3349 ~ office@RichmondFurnitureGallery.com

November 7, 2017

Mayor Dave Snow
City of Richmond
50 North Fifth Street
Richmond, IN 47374

Dear Mayor Snow,

Richmond Furniture Gallery, in the Historic Depot District, supports the City of Richmond and its Coalition partners' application for a U.S. EPA Brownfield Assessment Grant. We are committed to improving the quality of life for the citizens of our city.

Richmond Furniture Gallery is a local business dedicated to maintaining a vibrant commercial and residential area in Richmond's Depot District by advocating for historic preservation, promoting small business growth and encouraging community involvement. We support the preservation/restoration of the Richmond Depot District target area, and specifically the commercial district located on Fort Wayne Avenue and North "E" and 10th Street. Our vision is a thriving and revitalized Depot District with our existing historic buildings.

Richmond Furniture Gallery will assist the Coalition by circulating information about planned Brownfield public meetings and events, and providing our input on planned redevelopment in the area.

We look forward to working with the Coalition throughout this project to enhance the future of our great community.

Sincerely,

Roger Richert, Owner

Natalie Ripperger, Owner

Wednesday, November 8th, 2017

Mr. Snow,

It has come to my attention that there is a possibility that the city of Richmond could receive funding for a project through the Brownfield's Assessment Grant. Being the owner of a local business in the Depot District, and being very involved with every festival, concert and event put on in the Depot District, it is very important to me that the city recognizes and supports our efforts to better the community and make our city more appealing to tourists.

As important and successful as our festivals are in the Depot District, the number one reason why most people don't attend is parking. Although there is a small parking lot near the district designated for Depot visitors, it does not compare to the number of parking spaces needed to accommodate visitors and would-be attendees. Many of our festivals involve street closings, meaning folks have to park and walk; with mostly street parking available, those long walks are a deterrent for attendance. Of course, the small businesses of the Depot District thrive from traffic.

The building & property that is the subject of this supportive project, is very conveniently located at the very edge of the Depot, where most of the street closings and district shops begin. Because this building is what it is, there is virtually nothing that can be done with it (within reasonable means), so it serves absolutely no purpose- other than being in the way of what could be a very beneficial and significant part of the area.

Please consider this request, and know that I am available for any further questioning and/or support in this grant process.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam" followed by a stylized, cursive flourish.

Adam Melton
Melton Renzulli Wines
& The Cordial Cork

November 7, 2017

Mayor Dave Snow
City of Richmond
50 N 5th Street
Richmond, Indiana 47374

Dear Mayor Snow,

Roscoe's Coffee Bar and Tap Room would like encourage and support an application for a U.S. EPA Brownsfield Assessment Grant. The district and our community would benefit from the additional parking this grant could help create.

Roscoe's has been operating in Richmond's historic Depot District for over five years. We are committed to our community and we feel that the community supports us as well. If there is one single thing that holds us back or creates business instability, it is the need for more parking for those who would like to shop, dine, and conduct business within the district. Being a district of 1800's industrial buildings, parking was obviously not a consideration in that day. The very thing that makes the district attractive and vibrant is also what can deter potential customers from visiting. 'There is no place to park' is easily the reason most given when asking people why they don't visit more. This grant, if approved would do so much to alleviate this issue.

Roscoe's is willing to be of any help in making the district and our city succeed. We understand the value of working together with other individuals and businesses in a common goal. Certainly, this is something the community would benefit from and we are in great support of.

We look forward to working with the city now and in the future to better our city. Please count on us for support.

Sincerely,

Mike Widau
Owner, Roscoe's INC

DOCUMENTATION OF ALL APPLICABLE THRESHOLD CRITERIA

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The City of Richmond meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Richmond will utilize social media platforms, earned (free) media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See Section IV.C.3 Narrative Proposal/Ranking Criteria for further information.

III.C. Additional Threshold Criteria for Site-Specific Proposals Only

This criterion is not applicable for a Community-Wide Brownfields Assessment Grant application.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Richmond, City of

* b. Employer/Taxpayer Identification Number (EIN/TIN):

35-6001174

* c. Organizational DUNS:

0720504610000

d. Address:

* Street1:

50 N 5th Street

Street2:

* City:

Richmond

County/Parish:

* State:

IN: Indiana

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

47374-0000

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Jack

Middle Name:

* Last Name:

Cruse

Suffix:

Title:

Director of Infrastructure & Development

Organizational Affiliation:

* Telephone Number:

7659837584

Fax Number:

* Email:

jcruse@richmondindiana.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Richmond Community Wide Brownfields Assessment Grant for Petroleum & Hazardous Substances

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: